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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
MEDFORD DIVISION

JANE DOE, by and through her  
Guardian ad Litem Christina H,  
JANE DOE 2, by and through her  
Guardian ad Litem Elaine H, and  
JANE DOE 3, by and through her  
Guardian ad Litem, Jackie F.,  
Plaintiffs,  
v.  
MEDFORD SCHOOL DISTRICT  
549C, PHIL LONG, SALLIE  
JOHNSON, and CHRIS GILMAN,  
Defendants.

Case No. 1:10-cv-03113-CL

**MOTION FOR ORDER  
DIRECTING COMPLIANCE  
WITH SUBPOENA DUCE  
TECUM AND ORDER FOR  
SANCTIONS [FRCP 37 and  
45(c)(2)(B)(I), FRCP 11]**

TO THE MEDFORD POLICE DEPARTMENT AND THEIR ATTORNEYS OF  
RECORD:

PLEASE TAKE NOTICE plaintiffs will and hereby do move the court for and order

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DUCE TECUM

directing compliance with the Deposition Subpoena for Production of Business Records (“subpoena”) served by plaintiffs on the Medford Police Department (“Medford PD”) on October 25, 2010, requiring Medford PD to produce the documents and record of Medford PD’s Case No. 10-2052, and for monetary sanctions in the amount of \$2,100.00 for 7 hours of attorney time and travel for the costs of bringing this motion.

This motion is and will be made on the grounds that the records sought are directly relevant to the plaintiffs’ case, essential to a fair resolution of the lawsuit, and the defendant’s objections to the subpoena are not valid in federal court. Moreover, the information sought in the subpoena cannot be obtained by less intrusive means.

This motion is and will be based on this Motion, the Memorandum in Support of Motion, and the Affidavit of Thomas N. Petersen served herewith, all the pleadings, records, and papers on file in this action, and such further oral and documentary evidence as may be presented at the hearing of this motion.

DATED this 5<sup>th</sup> day of November, 2010.

BLACK, CHAPMAN, WEBBER & STEVENS

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